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EIS000735

RECEIVED

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January 4, 2000

Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
PO Box 30307, Mail Stop 010
North Las Vegas, NV 89036-0307

Dear Ms. Dixon:

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
(DEIS) FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF
SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE
AT YUCCA MOUNTAIN, NYE COUNTY, NEVADA

Attached for your necessary action are the City of Las Vegas
comments on the Draft Environmental Impact Statement for the Yucca
Mountain repository. If you have any questions, please contact me at
229-6551.

Sincerely,


Peter Cummings, Manager
International Affairs

PC:dh

Attachment

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**CITY OF LAS VEGAS COMMENTS
ON DEPARTMENT OF ENERGY'S (DOE's)
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR YUCCA MOUNTAIN**

EIS000735

- 1 • The City of Las Vegas supports the no-action alternative that is put forth in this Environmental Impact Statement (EIS). The nuclear utilities that are using on-sight storage are making a case that high-level radioactive waste can remain at their point of generation. The Nuclear Regulatory Commission (NRC) has certified the above-ground storage casts for at least 100 years. At that time, the use of transmutation or other new technology may solve the problem of the nation's nuclear waste without having to resort to the building of a geologic repository and the transportation of thousands of tons of high-level nuclear waste across the country.
- 2 • It's evident from a review of the EIS that the Yucca Mountain Repository is becoming an engineered repository as opposed to a true geologic repository. We believe it was the intent of Congress and other scientific groups that the rock itself was to serve as a geologic barrier to the migration of radionuclides. Yet, current engineering design for the repository continues to stress more and more the necessity for engineering barriers to prevent this migration with less dependence or trust on the rock to provide environmental protection.
- 3 • We are extremely concerned about the treatment of transportation, especially radiological risk and routing in this EIS. Nowhere does DOE mention preferred routes. There are frequent references to the use of the northern and southern beltway for transportation through the Las Vegas valley; when, in fact, the northern beltway is many years away from completion and the southern beltway is under construction. Both of these alternatives connect with Town Center, which is a large business and urban area to be developed over the next few years. We expect population density that will develop around Town Center to be approximately 200,000 people. It is simply unsuitable to even consider the northern or southern beltway to facilitate shipments of these wastes. We also expect that development will occur rapidly along both the northern and southern beltways as they are built and populations will increase substantially thereby increasing public health and safety and radiological risks. It is simply unacceptable that these thousands of shipments will travel through the Las Vegas valley when several rural options are available.
- 4 • In the EIS, the population used to determine radiological risk in the Las Vegas valley was based on 1990 census figures. These figures are hopelessly out of date. Current figures are available through the State of Nevada, yet they have not been used making impact determinations.
- 5 • Nowhere in the EIS is there any mention of preferred routes in Nevada or elsewhere in the United States for the movement of the spent nuclear fuel from the reactors to Yucca Mountain. How can you possibly determine the appropriate radiological risks, economic impact, or stigma effect without clearly delineating preferred routes of travel.

EIS000735

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- The EIS fails to consider the stigma effect or potential economic impact that would occur to our tourism-based economy should an accident occur anywhere in the Las Vegas valley. Those potential impacts need to be addressed.
- 7
- In the Nevada rail scenario, the EIS considers the Valley Siding as a potential location for rail-to-truck trans-shipments of high-level nuclear waste. That particular point is less than seven miles from the center of the City of Las Vegas and is simply not suitable for consideration because of public health and safety considerations.
- 8
- When the EIS considers intermodal transfer stations, no consideration is given to a potential location in Barstow or Yurmo, California. This is a well established rail yard with a large capacity with easy access to route 15 north bound to Baker then northwest through Death Valley and into the southern entrance to the Test Site.
- 9
- The no-action scenario 2 is extremely unrealistic to say from 100 - 10,000 years there would be no institutional control makes no sense. By that time, newer technologies may prevail and an alternative to geologic disposal could become available.
- 10
- At nowhere in the EIS is there any consideration of the economic impact or lowered property values that could result to properties which are located adjacent to shipment routes. This occurred in Santa Fe, New Mexico, and on routes near Savannah River where actual property values declined as a result of actual and potential radiological shipments.
- 11
- The EIS indicates DOE's preferred alternative is to proceed with proposed action to construct, operate, monitor, and eventually close a geologic repository for the disposal of spent nuclear fuel and high-level radioactive waste at Yucca Mountain. How can DOE possibly arrive at a preferred alternative when there are no transportation routes designated.
- 12
- The area of environmental justice addresses primarily Native-American issues. Other minority groups in urban areas may be effected just as much and should be considered.
- 13
- The analysis in the EIS appears to find many more potential impacts related to the no-action alternative than those connected with the preferred alternative.